

# Industrial Pretreatment Newsletter

Published for industrial dischargers by the King County Industrial Waste Program (KCIW)



**King County**

Department of  
Natural Resources and Parks  
Wastewater Treatment Division  
**Industrial Waste Program**

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## Mission Statement

*The mission of the Industrial Waste Program is to protect the environment, public health, biosolids quality, and King County's regional sewerage systems. We work cooperatively with our customers as we regulate industrial discharges, provide technical assistance, and monitor the regional sewerage system.*

## About the Industrial Pretreatment Newsletter

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**This material is provided  
in alternative formats  
upon request by calling  
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## What facilities need to know about KCIW self-monitoring reports

Competent and timely monitoring and sampling of industrial discharges form the bedrock of KCIW's pretreatment program, providing accurate, defensible data on industrial discharges to the County's sewer system. While KCIW staff collects 1,500-2,000 samples per year, industrial users of the sewer system do the majority of the work, collecting and analyzing more than 20,000 samples annually!



Industrial users submit the data they collect based on a prescribed schedule contained in each facility's discharge approval document. What facilities must report varies, based on the sampling parameter schedules for each facility that has an industrial wastewater discharge approval that specifies sampling.

Pretreatment regulations require that facilities get reports in on time. The common factor for all self-monitoring reports is that they are due on the 15th of the month, whether required monthly, quarterly, semiannually, or annually.

## Some commonly asked questions include:

### Will reports be late if received after the 15th?

Not necessarily. The program makes allowances for holidays and weekends when reviewing receipt dates.

### Why is it important to submit the self-monitoring report on time?

- When KCIW receives the self-monitoring data, program staff must enter it into a database and complete its internal review process by the end of the month so that the program can track monthly average compliance.

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- Late reports require follow-up that demands valuable time of program staff. For instance, one month a compliance investigator reported spending more than two hours making calls and writing final notices to facilities that had late reports. This is not value-added time, and while program staff may remind facilities of late reports, doing so repeatedly is not appropriate. Facilities that repeatedly fall behind in their reporting may receive a formal letter from the program.
- Note that late reports affect facilities' eligibility to earn compliance awards in KCIW's Rewards and Recognition Program.

### **What are ways to avoid sending late self-monitoring reports?**

- Establish a clear protocol with backup staff may be necessary especially during summer vacation and holiday periods.
- Collect and analyze samples earlier in the month. This allows sufficient time for lab analysis and reporting before self-monitoring reports are due.

### **How do facilities submit a self-monitoring report?**

Please submit reports one time only! Some facilities currently send self-monitoring reports in multiple ways, such as by regular or express mail, by fax, or via email attachment. Multiple submittals are not necessary, and handling them can reduce program staff efficiency. The program recommends the following three options for submittal of self-monitoring reports:

1. The program's preferred method of submittal is via email attachment sent to *info.KCIW@kingcounty.gov*. Many facilities are practicing this method and KCIW staff appreciates it. Facilities must send a scanned report that has been signed. Please do not submit self-monitoring reports directly to the assigned compliance investigator's email account. This may cause delays in KCIW receiving the reports.
2. Submit by regular U.S. mail. Care must be taken to allow for delivery of U.S. mail on time.
3. Fax reports to 206-263-3001.

All reports that facilities submit must be signed by an authorized representative of the facility.

## **KCIW's Industrial Waste Advisory Committee (IWAC) Nov. 2 meeting topics**

**King County Combined Sewer Overflow (CSO) Program update**, Karen Huber, King County Wastewater Treatment Division CSO program manager

### **KCIW program updates, review and discussion**

- **Construction dewatering projects**
- **KCIW fees and billing procedures**
- **Local discharge limits**
- **For the program's industrial users:**
  - Fifth-annual customer survey in 2012
  - Upcoming article on self-monitoring reports
  - Program's violations display ad
  - KCIW's 2012 industrial user workshop
- **Puget Sound Action Agenda**

**Upcoming meeting:** The next IWAC meeting will be Feb. 1, 2012. Meetings are normally held at 130 Nickerson St., Suite 105, Seattle. The building is wheelchair accessible. Special accommodations can be arranged by calling 206-263-3000 or TTY: 711 or e-mailing: *info.KCIW@kingcounty.gov*.

IWAC meeting summaries and other information is located online at: **[www.kingcounty.gov/industrialwaste](http://www.kingcounty.gov/industrialwaste)**. See menu item "About the program."

### **Roundtable**



## New KCIW fact sheets and technical memorandums provide assistance for industrial users of the sewer system

### King County Wastewater Discharge Limits fact sheet: KCIW

has produced a new fact sheet King County Wastewater Discharge Limits. This is the third fact sheet in a set that provides general information about the program and its fees.



### Technical memorandum

**Minimum Standards for Sedimentation Tanks Used at Construction Dewatering Sites:** KCIW has evaluated the technology readily available for construction dewatering discharges and determined that use of rectangular sedimentation tanks is the minimum required treatment when settleable solids are encountered. The findings of this evaluation are summarized in the recently-issued technical memorandum. There is additional information about the use of rectangular sedimentation tanks in the section of KCIW's Web pages: getting approval to discharge industrial wastewater/construction sites.

**Technical memorandum on flow-proportioned sampling for permitted facilities:** This 2010 KCIW technical memorandum provides guidance on implementing flow-proportioned sampling. As King County industrial wastewater discharge permits come up for renewal or when the program issues new permits, it requires implementation of flow-proportioned sampling or a demonstration that the facility's current sampling protocol is adequate. This applies only to facilities with permits, not those with discharge authorizations.

**Accessing these documents:** All of these documents are available to download on the program's Technical Assistance Web page. For all of these topics see our menu at easy link [www.kingcounty.gov/IndustrialWaste](http://www.kingcounty.gov/IndustrialWaste). To obtain print copies from KCIW or for further information see *Contacts*, page three.

## A look ahead to 2012

Each year in this newsletter, KCIW offers a glance at upcoming projects and initiatives.

### In 2012:

- KCIW will continue with some 2011 priorities including a focus on ongoing improvements to its internal procedures. Using the results from the 2011 sampling effort to characterize industrial discharges, the program will evaluate the need to update the type and frequency of self-monitoring and/or King County monitoring for industrial users of the sewer system in several federal categories.
- After a year of review of fee procedures, the program plans in 2012 to communicate about and implement streamlined procedures for fees that it expects will result in sustainable fee changes in the future.
- This year it is a program priority to coordinate closely with large regional users of the County's sewer system, local sewer agencies and the Washington State Department of Ecology to plan ahead for large regional construction projects.
- KCIW will invite industrial users to a workshop and a tour of the new Brightwater Treatment Plant in May (see page 8).
- Focusing on customer feedback to continue to be an effective regulatory program, KCIW will use a consultant to administer its fifth customer survey of industrial users.



## 2012 KCIW fees and charges

### Adjustments to ensure that costs are recovered

KCIW continually examines and periodically adjusts its fees and charges to meet its requirement of ensuring that industrial users pay their proportionate share of the costs of operation and maintenance of the County's sewer system.

In 2012 a number of KCIW fees are increasing, including those for industrial wastewater discharge approvals; a number of post-violation analytical charges; the high strength surcharge for Biological Oxygen Demand and total suspended solids, and the administrative/monitoring charges for heavy metals and Fats, Oils, and Grease. The following fees and charges are changing in 2012:

- To allow the program and the County's Wastewater Treatment Division finance section time to complete the evaluation of internal assessment procedures of industrial user fees, the director has approved the new fees for up to 18 months. The goal of the internal evaluation that began in 2010 is to streamline internal procedures, enhance quality assurance practices and to make fee increases more uniform and predictable in the future.
- Industrial wastewater discharge permits, discharge authorizations, and Letters of Authorization are all going up by 20 percent as part of the program's incremental increase that began with 2011 fees.
- Post-violation analytical costs directly affect those dischargers that have had violations (normally 10-15 facilities annually).
  - In 2012 there are some increases

and decreases to post-violation costs.

- The program is adding settleable solids to the 2012 list of analytical charges.
- Starting in January 2012 billing for all discharge approval documents will occur at the time the program issues the documents. Previously industrial users of the sewer system had to pay for all documents, with the exception of Letters of Authorization, prior to issuance.

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### 2011 and 2012 Industrial Waste Program Fees

	2011 Fees	2012 Fees
<b>High Strength Surcharge</b>		
Biological oxygen demand	\$0.169279/lb	\$0.189542/lb
Total suspended solids	\$0.301709/lb	\$0.310245/lb
<b>Monitoring Charges</b>		
Heavy metals	\$0.003108/gal	\$0.003169
Fats, oils and grease (FOG)	\$0.000159/gal	\$0.000295
<b>Permit/Authorization Fees</b>		
Discharge Permit (New & Renewal)	\$2,610	\$3,130
Major Discharge Authorization (New & Renewal)	\$1,320	\$1,585
Minor Discharge Authorization (New & Renewal)	\$695	\$835
Letter of Authorization	\$295	\$355
<b>Post Violation Fees (Sampling and Analysis Costs)</b>		
Base neutral acid grab	\$1,920	\$1,735
Base neutral acid composite	\$2,205	\$1,735
Cyanide grab	\$690	\$770
Cyanide composite	\$970	\$770
Free-floating polar FOG test	\$285	\$310
Nonpolar FOG (set of three samples)	\$400	\$445
Metals grab (including mercury)	\$420	\$500
Metals composite (including mercury)	\$705	\$500
pH grab	\$285	\$310
pH continuous (24-hour)	\$570	\$310
Settleable solids (volumetric)	N/A	\$440
Volatile organic acid grab	\$1,100	\$1,020
Volatile organic acid composite	\$1,385	\$1,020
<b>Other Post-Violation Fees</b>		
Enforcement Action	\$760	\$1,000
Inspection	\$330	\$355

**Note:** Some dischargers have specially-calculated charges. These dischargers include those with specified ranges of discharge volumes (e.g. zero discharge; construction dewatering sites). Calculation costs are based on administration, inspection and sampling and analytical costs where applicable.



- Under this new billing procedure, applicants for discharge approval documents will have 30 days to pay for the documents from the date they receive the invoice from King County. King County Wastewater Treatment Division finance staff will send an open balance letter reminding facilities of late payments after 30 days. If the account is not brought current in response to the open balance letter, a warning letter will be issued by finance staff. This letter will inform the customer that they must either bring the account current within 30 days or call to set up a payment plan, or risk refusal/stoppage of service.

### Cost reduction opportunities:

During 2011, two facilities worked closely with KCIW staff to take advantage of King County Code changes that provide flexibility for some low volume dischargers to operate under a reduced level of permitting. In both cases, the facilities will save a significant amount of money over what they are currently spending for self-monitoring and permit fees. The program is working with six other facilities that wish to adopt the less stringent requirements.

If a facility is discharging or can discharge less than 100 gallons per day (gpd) it may meet one set of criteria for possible cost-savings. Those discharging less than 5,000 gpd may also save costs. All potentially eligible facilities should check with their assigned KCIW compliance investigator to discuss cost-saving opportunities for 2012.



## Technical assistance resource

Ecology's Hazardous Waste and Toxics Reduction Program's website has a set of self-guiding tutorials addressing the basics of dangerous waste management and explaining differences between the state and federal requirements.

Access the tutorials at:

**[www.ecy.wa.gov/programs/hwtr/workshops/index.html](http://www.ecy.wa.gov/programs/hwtr/workshops/index.html)**

## The wastewater discharge permit application: frequently asked questions

*In an ongoing effort to improve the process for industrial users of the King County sewer system when they apply for industrial wastewater discharge approvals, KCIW is addressing frequently asked questions about terms used or routine requirements cited in the permit application.*

### 1. When are engineering reports necessary or required?

Generally, submittal of an engineering report and approval by KCIW is required prior to the installation of all new pretreatment systems. An engineering report is also required when the facility applying for a wastewater discharge approval is proposing to make significant changes to the existing pretreatment system, including a change in flow rate, concentration, chemical composition or any other factor that could affect the effluent quality. If a facility is uncertain, it should always consult with KCIW to determine whether it is required to submit an engineering report.

### 2. Why does King County need to know the raw materials and chemicals used in the industrial process?

Because these materials have the potential to reach the sewer and the treatment plant, KCIW needs to know the quantities; the purpose; the tank volumes and the working concentrations of materials and chemicals on-site in order to determine the amount of risk that the facility poses to the sewer system and the treatment plant.

### 3. In the general instructions of the wastewater discharge permit application, KCIW requires that the facility submit three copies of the application. Why are three copies needed?

KCIW keeps two copies of the completed application in two types of filing systems and forwards a third copy to the applicable local sewer agency for its review and comment.

Receiving the three full copies of all materials with an application can save KCIW time, as for instance, applications' site plans, maps, and manuals are not easily photocopied.

*Applicants are encouraged to contact KCIW with all questions early in the process of applying (see Contacts, page three).*

## When does the King County's Hauled Waste Rule apply to industrial users of the sewer system?

*Approval to discharge industrial wastewater to the County sewer system does not include permission to utilize a septage hauler to transport hauled waste to the King County South Plant, even if it is primarily domestic or sanitary waste. KCIW approval is required for these wastes.*

King County's South Treatment Plant accepts domestic septage on a daily basis and may accept septage or sewage from a commercial source if KCIW issues an approval. King County Public Rule PUT 8-22 clarified the responsibilities of businesses and septage haulers that dispose of commercial septage at a county treatment plant.



Septage disposal facility, King County's South Treatment Plant, Renton.

KCIW will only consider the acceptance of commercial or industrial wastes at the County's septage facility if these wastes are mixed with domestic waste. These rules are necessary because different federal and state regulations apply to wastewater depending on how the waste is conveyed to the treatment plant, with more stringent rules applying to waste that is hauled directly to the plant.

Whenever facilities plan to use a waste hauler permitted to haul septage or vactored waste to transport their wastes to the County's South Plant septage acceptance facility, these facilities are required to obtain separate approval from KCIW, regardless of the type of waste haulers are collecting. For example, if a facility has a blockage in its private side sewer, or if its private lift station needs routine or emergency maintenance, it should ask the hauler where it intends to dispose of the waste stream. If the waste is going to South Plant, the facility must submit a septage acceptance application (see sidebar).

## Do industrial users have other options for disposal of these wastes?

Yes, industrial users may use a commercial treatment facility that accepts industrial waste mixed with septage, eliminating the necessity of the approval process to haul to South Treatment Plant.

*For additional information see KCIW's septage acceptance fact sheet available on the program's web pages or contact KCIW. (See Contacts, page 3.)*

## Getting approval to send non-residential/commercial septage to King County

Facilities having septage or vactored wastes hauled to the County's South Treatment Plant septage acceptance facility must submit a septage acceptance application to KCIW.

The facility must contact KCIW to fill out the septage acceptance application. (See Contacts, page 3 or go to [www.kingcounty.gov/industrialwaste](http://www.kingcounty.gov/industrialwaste).)

Depending upon the nature of the facility and the best management practices or treatment in place, the County may ask that the contents of the truck be sampled prior to hauling to the treatment plant, or may not allow the waste to be hauled to its facility. In this case facilities would need to work with their haulers to find a suitable alternative.

If KCIW approves the waste, a facility will receive an authorization number that it must give to the hauler. The hauler is required to write the company name and address along with the approval number on the hauled waste certification form that it submits to the plant with each commercial load.



## Recent enforcement actions

King County's Industrial Waste Program is responsible for making sure that water used by county industries returns to our waterways clean and safe. This protects our water resources, our public health, the workers at our treatment plants and the biosolids produced there.

Most businesses in King County do an excellent job of meeting this clean water goal by treating their industrial wastewater before they discharge it to the sewer. Whenever possible, we work to provide technical assistance and help industries reach compliance before enforcement actions become necessary. If companies violate clean water standards, however, we do take enforcement actions, as federal regulations require.

The following companies are users of the County sewer system that violated treatment requirements between August 2011 and October 2011 or have not had their violations previously published. They were found in significant noncompliance during the reporting period; received fines; had violations that were unique or warranted special attention; or met a combination of those actions.

### The following facility sends its wastewater to King County's South Treatment Plant, Renton

#### Puget Sound Recycling, Auburn

Nature of Violation/Type of Pollutant:	Basis for Publication:	Comment:
Discharge violations-n-Octadecane (1); Non-Polar FOG (1).	Puget Sound Recycling had a violation that warranted a fine and was in significant non-compliance because it exceeded the technical review criteria, that is, during a six-month period at least 33 percent or more of the measured concentrations of n-Octadecane were in excess of the standard by a factor of 1.2 times the limit in the last six months.	Puget Sound Recycling was required to: 1) cease all discharge of wastewater to the sanitary sewer; 2) collect a representative sample of each proposed discharge prior to release; 3) test each sample as required by the wastewater discharge permit; 4) report the results to King County for discharge approval. If the analytical results indicate that the wastewater does not meet applicable standards, the wastewater shall be held and retreated on site or hauled off-site for treatment.

Penalty: A compliance schedule, a notice of significant non-compliance, a \$10,000 fine, and a \$14,650 post-violation charge.

### The following facilities send their wastewater to King County's West Point Treatment Plant, Seattle

#### King County Wastewater Treatment Division (Kenmore Construction Site), Kenmore

Nature of Violation/Type of Pollutant:	Basis for Publication:	Comment:
Permit violations for: 1) failure to report changes in waste discharge characteristics; 2) failure to obtain prior approval for modification of pretreatment system; 3) failure to notify King County within 24 hours of becoming aware of a violation.	King County Wastewater Treatment Division (Kenmore Portal Construction Site) had violations that warranted a monetary penalty.	King County Wastewater Treatment Division completed all required items in the compliance order.

Penalty: A \$16,093 fine, \$1,205 post-violation charge and a compliance schedule.

#### Shultz Distributing, Inc., Seattle

Nature of Violation/Type of Pollutant:	Basis for Publication:	Comment:
Filing a report past the final notice deadline.	Shultz Distribution had a violation that warranted a monetary penalty.	The report was filed.

Penalty: A \$500 fine.

**Other Enforcement Actions:** The King County Industrial Waste Program also acted on eight other violations at eight facilities for the following parameters: permit violations: A) discharge without authorization (1); B) discharge at an unauthorized location (1); C) discharging under an expired authorization (1); reporting-late reports (4); settleable solids (1).

We all need to work together to prevent pollution. If you have information for the Industrial Waste Program or questions about our programs, please call 206-263-3000 or TTY: 711, or email: [info.KCIW@kingcounty.gov](mailto:info.KCIW@kingcounty.gov). You may also visit our program's pages at: [www.kingcounty.gov/industrialwaste](http://www.kingcounty.gov/industrialwaste) to learn more.



RETURN SERVICE REQUESTED

## SAVE THE DATE for KCIW's 2012 industrial user workshop!

Next year's workshop will take place May 10 at the Education and Community Center of King County's new Brightwater Treatment Plant, just north of Woodinville. The event will include an optional tour of the plant, and will feature a range of useful information for industrial users of the County sewer system as well as recognizing awardees of KCIW's 2011 Rewards and Recognition program. Registration will begin and additional notification will be provided in March.



*King County's Brightwater Treatment Plant*

*Creating Resources from Wastewater*